

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA**

TIFFANY LEWIS, on behalf of herself and
others similarly situated,

Plaintiff,
v.

REGISTER.COM, INC.

Defendant.

Case No.: 1:25-cv-00275-JPH-MJD

Judge: Robert J. White

Magistrate Judge: Mark J. Dinsmore

**DEFENDANT'S NOTICE OF WITHDRAWAL
OF MOTION TO STRIKE, WITHOUT PREJUDICE**

Defendant Register.com, Inc., (“Defendant”) by and through undersigned counsel, hereby files this Notice of Withdrawal of its Motion to Strike Class Allegations, Without Prejudice and states as follows:

1. On August 27, 2025, Defendant filed its Motion to Strike Class Allegations in the Amended Complaint (Dkt. 39) (hereinafter the “Motion to Strike”).
2. Following the filing of the Motion to Strike, the parties agreed to engage in voluntary mediation.
3. On October 30, 2025, the parties engaged in an initial mediation session. Although the session was productive, the parties were unable to resolve this dispute.
4. The parties have agreed to engage in a second mediation session, which is currently scheduled to occur on November 24, 2025.
5. Plaintiff Tiffany Lewis’s opposition to Plaintiff’s Motion to Strike is currently due on November 13, 2025 (Dkt. 56).

6. In light of the forthcoming mediation session, and the parties' continued efforts to resolve this dispute without the need for further litigation, Defendant hereby withdraws its Motion to Strike, without prejudice.

7. At this juncture, withdrawal of the Motion to Strike will serve the interests of judicial economy and preserve the parties' resources.

8. In the event the parties are unable to resolve this dispute, and discontinue mediation efforts, Defendant reserves the right to refile its request to strike the class allegations in the Amended Complaint.

WHEREFORE, Defendant respectfully provides notice to this Honorable Court of its withdrawal of the Motion to Strike, without prejudice.

Dated: November 6, 2025

Respectfully Submitted,

/s/ A. Jeff Ifrah
A. Jeff Ifrah
jeff@ifrahlaw.com
Abbey Block
ablock@ifrahlaw.com
Ifrah PLLC
1717 Pennsylvania Ave. NW
Suite 650
Washington, D.C. 20006
Tel: (202) 524-4140

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of November 2025, I filed the foregoing with the Court's electronic filing system, which will automatically provide notice to all counsel of record.

Dated: November 6, 2025

/s/ A. Jeff Ifrah
A. Jeff Ifrah